

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARTIN J. WALSH, Secretary of Labor,  
United States Department of Labor,

Petitioner,

v.

METLIFE, INC.,

Respondent.

Misc. Civ. Action No.  
21-mc-381

**THE SECRETARY OF LABOR'S PETITION TO ENFORCE ADMINISTRATIVE  
SUBPOENA**

Petitioner Martin J. Walsh, Secretary of Labor, United States Department of Labor (the "Secretary") hereby petitions this Court, upon the accompanying memorandum of law in support of this petition, the declaration of Todd Hassler and supporting exhibits, to enforce an administration subpoena pursuant to section 504(a) of the Employee Retirement Income Security Act of 1974 ("ERISA"), 29 U.S.C. § 1134(a). The Secretary respectfully requests this Court to grant his petition and enter the proposed order:

- (1) Compelling Respondent MetLife, Inc. ("MetLife"), on a date to be fixed by the Court, to produce all documents responsive to the subpoena issued by New York Regional Office of the Employee Benefits Security Administration on January 5, 2021;
- (2) compelling MetLife to cease its disobedience to this lawfully issued administrative subpoena or suffer contempt;
- (3) Any such other relief as may be necessary and appropriate.

Dated: March 31, 2021  
New York, New York

ELENA S. GOLDSTEIN  
Deputy Solicitor of Labor

JEFFREY S. ROGOFF  
Regional Solicitor

By: s/ Alexander M. Kondo  
ALEXANDER M. KONDO  
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